BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE CONTESCION OFFICE OF THE CLOSE ART

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE FOLLOW-UP INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO STAMPS.COM WITNESS LAWTON (USPS/STAMPS.COM-T-3-7-8)

Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following follow-up interrogatories and requests for production of documents to Stamps.com witness Lawton: USPS/STAMPS.COM-T-3—7-8.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-3078; Fax -5402 July 10, 2000

USPS/STAMPS.COM-T3-7. Please refer to your response to USPS/STAMPS.COM-T-3-4.

- a. Please confirm that for survey questions 6(b) and 7(b), which refers to 9-digit zip codes, the questions should read "... [if **greater than** 0, then goto (c)]." If not confirmed, please explain.
- b. If confirmed, what impact did the errors noted in (a) have on the results of your survey.

USPS/STAMPS.COM-T3-8. Please refer to your response to USPS/STAMPS.COM-T-3-4. Questions 6(a) and 7(a) ask customers the percentage of pre-IBIP mailpieces that were printed, typed, and handwritten.

- a. Confirm that not all answers reflected 100 percent mail volume.
- b. Confirm that no adjustment was done to reflect the higher mail volume of businesses.
- c. If (a) and/or (b) are confirmed, explain what impact the errors had on the results of your survey.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 July 10, 2000